IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE

GUEST HOUSE AT GRACELAND, LLC,)
Plaintiff and Counter-Defendant,)
v.)
PYRAMID TENNESSEE MANAGEMENT, LLC,)))
Defendant, Counter-Plaintiff, and	No. 2:18-cv-02074-JTF-cgc
Third-Party Plaintiff,)
v.))
ELVIS PRESLEY ENTERPRISES, INC.,))
Third-Party Defendant.))

PYRAMID TENNESSEE MANAGEMENT, LLC'S UNOPPOSED MOTION TO EXTEND RESPONSE DEADLINES

Pyramid Tennessee Management, LLC ("Pyramid"), by and through undersigned counsel, respectfully submits this Unopposed Motion to Extend Response Deadlines and states as follows:

- 1. On March 29, 2018, Third-Party Defendant Elvis Presley Enterprises, Inc. ("EPE") filed its Motion for Judgment on the Pleadings. (Doc. 26.) Under Local Rule 12.1(b), Pyramid's response deadline is April 26, 2018.
- 2. On April 10, 2018, Plaintiff/Counter-Defendant Guest House at Graceland, LLC ("GHG") filed its Motion for Leave to Amend Complaint. (Doc. 33.) Under Local Rule 7.2(a)(2), Pyramid's response deadline is April 24, 2018.

- 3. Counsel for Pyramid has been in communication with counsel for EPE and GHG, who requested the following:
 - a. That the deadline to respond to EPE's Motion for Judgment on the Pleadings be extended to May 25, 2018; and
 - b. That the deadline to respond to GHG's Motion to Amend Complaint be extended to May 1, 2018.
 - 4. Counsel for EPE and GHG advised that they do not oppose Pyramid's requests.

Pyramid therefore respectfully requests the Court enter an Order that provides that that the deadline to respond to EPE's Motion for Judgment on the Pleadings be extended to May 25, 2018; and the deadline to respond to GHG's Motion to Amend Complaint be extended to May 1, 2018.

DATED this 17th day of April 2018.

Respectfully submitted,

s/ Jonathan E. Nelson

John S. Golwen (B.P.R. #14324) Jonathan E. Nelson (B.P.R. #28029) BASS, BERRY & SIMS, PLC 100 Peabody Place, Suite 1300 Memphis, Tennessee 38103-3672

Telephone: (901) 543-5900

Email: jgolwen@bassberry.com

jenelson@bassberry.com

Gary S. Thompson (D.C. Bar No. 435315) Kristin C. Davis (D.C. Bar No. 992882) WEISBROD MATTEIS & COPLEY PLLC 1200 New Hampshire Avenue NW, Suite 600 Washington, District of Columbia 20036

Telephone: (202) 256-9910

Email: gthompson@wmclaw.com

kdavis@wmclaw.com

Attorneys for Pyramid Tennessee Management Company, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 17th day of April, 2018, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

s/ Jonathan E. Nelson